

VIA ELECTRONIC FILING

March 29, 2011

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte: CG Docket 10-51

Dear Ms. Dortch:

On March 28, 2011, David Bahar, Director of Government and Regulatory Affairs of Convo Communications, LLC ("Convo"), met via phone with Margaret McCarthy, Wireline Policy Advisor to Commissioner Copps. On March 29, 2011, Convo met via phone, individually, with Sherrese Smith, Legal Advisor for Media, Consumer and Enforcement Issues for Chairman Genachowski, Jennifer Tatel, Media Issues Legal Advisor to Commissioner Baker, Angela Kronenberg, Wireline Legal Advisor for Commissioner Clyburn, and Christine Kurth, Policy Director and Wireline Counsel for Commissioner McDowell.

During each phone call, Convo discussed the Report and Order due to be presented at the FCC Open Meeting on April 7th. According to the tentative agenda, "a Further Notice of Proposed Rulemaking proposes to require all VRS providers to obtain certification from the FCC under new, tighter certification procedures in order to receive compensation from the TRS Fund." Convo fully supports new, tighter certification procedures for VRS providers to combat fraud, waste and abuse. However, Convo expressed concern at the length of time that its application for certification has been pending.

Convo respectfully requests that the Commission provide a framework to allow providers who have pending applications for certification an opportunity to become certified through the new certification procedures.

Convo also raised the following separate points: 1) provider operating Canada-based call centers should be required to comply with more stringent reporting requirements; 2) home-based call centers should be disallowed in the absence of extremely stringent regulations protecting the confidentiality of the call and combating fraud, waste and abuse; and 3) international phone calls are a major source of fraud, waste and abuse, and should be disallowed unless VRS customers notify their default VRS provider prior to leaving the United States of their travel itinerary, or, if already out of the country, that VRS customers provide a passport and allow their passport number to be recorded prior to the initiation of the call.

David J. Bahar

A handwritten signature in black ink, appearing to read "David J. Bahar", with a horizontal line extending to the right.

Director of Government and Regulatory Affairs
Convo Communications, LLC